

DRINKER BIDDLE & REATH LLP
Adina D. Bingham, Esquire
One Logan Square
18th and Cherry Streets
Philadelphia, PA 19103
(215) 988-2696
Attorneys for Defendants
Thomas & Betts Corp.
Techalloy Co., Inc.
Rhans Specialty Metals, Inc.

**UNITED STATES DISTRICT COURT
FOR THE EASTER DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,	:	
Plaintiff	:	
	:	CIVIL ACTION
v.	:	No. 02-3830
	:	
ADVANCED ENVIRONMENTAL	:	
TECHNOLOGY CORPORATION et al.,	:	
Defendants	:	

NOTICE OF DEPOSITION

TO: Glenn Harris, Esq.
Ballard Spahr Andrews & Ingersoll, LLP
Plaza 1000 – Suite 500
Main Street
Vorhees, NJ 08043-4636
Attorneys for Plaintiff

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, deposition upon oral examination of the below deponent will be taken before a notary public or some other officer authorized by law to administer oaths and take depositions, at the offices of Drinker Biddle & Reath LLP, One Logan Square, 18th and Cherry Streets, Philadelphia, PA 19103 at a date and time to be scheduled by agreement of the parties. This examination is to be conducted from day to day or upon such adjourned date(s) as may be agreed upon until concluded.

Plaintiff Boarhead Farm Group Agreement member SPS Technologies, Inc. (on behalf of Standard Pressed Steel) by its representative or representatives designated pursuant to Fed. R. Civ. Pro. 30(b)(6) with regard to matters relevant to the above-captioned litigation. The matters upon which examination are requested are:

1. The waste streams created at the Standard Pressed Steel Facility in Jenkintown, Pennsylvania between 1970 and 1978.
2. The waste disposal practices of the Standard Pressed Steel Facility in Jenkintown, Pennsylvania between 1970 and 1978.
3. The relationship between Marvin Jonas and his business(es) and Standard Pressed Steel between 1970 and 1978.
4. The relationship between Manfred DeRewal and his business(es) and Standard Pressed Steel between 1970 and 1978.
5. The relationship between the Boarhead Farms site and Standard Pressed Steel between 1970 and 1978.
6. The money that SPS Technologies, Inc. and/or Standard Pressed Steel has expended in connection with the remediation of the Boarhead Farms Superfund site.
7. All matters contained in the Objections and Responses of Boarhead Farm Agreement Group to Document Requests and Interrogatories of Defendants Techalloy Company, Inc., Rhans Specialty Metals, Inc. and Thomas & Betts Corporation as they relate to the Standard Pressed Steel Facility in Jenkintown, Pennsylvania or SPS Technologies, Inc.


Adina D. Bingham

Dated: December 30, 2004